



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

March 4, 2021

**BY ECF**

The Honorable P. Kevin Castel  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:    *United States v. Geovanny Fuentes-Ramirez, S6 15 Cr. 379 (PKC)***

Dear Judge Castel:

The Government respectfully submits this letter in response to today's order (D.E. 257) that, *inter alia*, directs the Government, "[t]o the extent the government has not already done so," to "forthwith turn over to the defense any communications, including texts, emails, photos, voice or video recordings, referred to in the government's letter of March 2, 2021 and/or the defense's letter of March 3, 2021 (the 'Material') and shall further: (A) provide to the defense any translations of the Material, whether or not complete or official; and (B) identify to the defense and to the Court any and all such Material that it intends to offer into evidence at trial."

The Government respectfully advises the Court that the Material referred to in the Government's March 2, 2021 letter, comprising of records relating to an iCloud account and an Instagram account, was produced to defense counsel prior to the filing of that letter, including marked proposed exhibits from that Material and any completed translations. The Government produced today draft translations of a limited number of chats and one image from the iCloud Account that it is not introducing at trial, which completes its production of translations related to that account (or any other material). As noted in the Government's March 3 letter, the Government is not offering any of the Material referred to in defense counsel's March 3 letter, which consists of prison emails and calls of the defendant. In addition, copies of all of the Government's current proposed exhibits, including exhibits from the Material, will be provided to chambers today.

Respectfully submitted,

AUDREY STRAUSS  
United States Attorney

by: \_\_\_\_\_ /s/  
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cc: Defense counsel of record (by ECF)